

Ofcom Broadcast and On Demand Bulletin

Issue 450
9 May 2022

Your Loveworld

Type of case	Broadcast Standards
Outcome	In Breach
Service	Loveworld
Date & time	4 September 2021, 09:30
Category	Harm and religious programmes
Summary	This programme featured potentially harmful statements without providing adequate protection to viewers. It solicited donations on the basis of religious faith with claims they would improve the donor's health, wealth and success. Decision in breach of Rules 2.1 and 4.6. We considered these breaches to be serious and, in the case of Rule 2.1, repeated, and therefore we are minded to consider them for the imposition of a statutory sanction.

Introduction

Loveworld Television Network ("Loveworld") is a religious channel broadcast on satellite in the UK. The licence for Loveworld is held by Loveworld Limited ("LL" or "the Licensee").

Your Loveworld is a programme that includes sermons given by Christian pastors with teachings and demonstrations of faith. During the course of monitoring¹, Ofcom identified content in the above programme which raised potential issues warranting further investigation under [the Broadcasting Code](#) ("the Code").

¹ Ofcom can launch investigations following complaints from viewers and listeners or from its own monitoring.

The Content

This episode of *Your Loveworld* involved prayer and lifestyle advice based on Christian teachings and practices from the Bible. The programme was presented by Dr Mike Smalley (“Dr Smalley”) and Dr James Payne (“Dr Payne”) who are pastors on the channel and included several appeals for the audience to donate money by dialling a number or entering a code in the KingsPay app², both of which were displayed on the screen.

The programme included the following statements:

Dr Smalley: *“There’s really no such thing as sowing and reaping. It’s sowing, waiting and reaping seed, some time, and then a harvest and waiting. As I told you yesterday, it’s the proof of trust. If Richard Roberts³ dropped me off at the corner store and said I’ll be back in 30 minutes to pick you up, what’s the proof I trust him? That I’m standing there, at the appointed time that I’m waiting for him. He told me he’d be back, I’m waiting. That’s the proof I trust him. So I said: ‘Mike, I sowed a seed, I haven’t got a harvest yet. Waiting is the proof of trust. Jesus said if you’ll give, it’ll come back to you. Good measure, pressed down, shaken together and running over’.*

[...]In Malachi Chapter three, if you’ll bring me the tithes and the offerings, I’ll open the windows of heaven and pour out a blessing for you. You won’t have room enough to receive, and he said I’ll rebuke the destroyer, which means God will position himself to become an enemy to your enemy. That’s the Jesus we love, that’s the, that’s the instruction that God gives us as we can keep what’s in our hand or we can sow it. Let God get in covenant with it and let him send it back to us good measure, pressed down, shaken together and running over. Can you hear a good Amen today all across this world? Jesus is giving us an opportunity to stand with Pastor Chris, to stand with Pastor Benny, to stand with the Loveworld team and say we’re not going with the Devil run riot, shot over our families anymore, over our nations anymore. We’re going to stand up and believe God to give us good measure, pressed down, shaken together and running over.

We’re sowing seed to create a harvest. And yesterday I felt so stirred. I’m gonna say right there, there’s many more, but as I was speaking yesterday, I asked the Holy Spirit to speak to 700 of us who had planted \$1,000 seed. I want to talk to you right now that have not yet done so, and I’m going to ask you as soon as I finish my special prayer to go to the phone. You’re going to see a number that’s on the screen there. And as the choir’s preparing to come and our keyboard player’s playing

² KingsPay is an app that allows people to make payments and is used by Loveworld.

³ Dr Richard Roberts is another pastor who featured in this broadcast.

something right now. I want to look into the camera and say this is an opportunity for you to use your faith. The number 1,000's unique, I'm going to sow.

I was just thinking a moment ago about the number seven, seven is the number of completion in the Bible. So I've asked the Lord for 700 people who would sow \$1,000 seed. I'm going to sow a \$7,000 seed. Because I'm working with that number seven. I want God to take me to a whole new level in my finances and in my ministry. Some of you, there's about five of you I think who'll just join me and say, you know what, I'm gonna do it too Doctor Smalley, I'm going to sow a \$7,000 seed as well. Some of you in business should sow it for each one of your unsaved children, as a seed. So you Christian businessmen should sow it for, you pastors should sow one for every member of your staff that God would take you to a whole new level. But there's 700 of us, they're going to sow the \$1,000 seed and I'm gonna ask if, if Dr Payne, would you come stay with me here, Doctor Richard Roberts would you come, 'cause we're gonna pray in a second about your miracle.

[...]And you asked God for a miracle he'll give you an instruction, that may be illogical to your mind. Some of you may say 'Mike it's a bad time to sow a \$1,000 seed. I'm gonna have to just wait a few more weeks, few more months', but you know you feel the Holy Spirit saying it to you today. Today's the day.

Doctor Avanzini talked about how, when Elijah was dealing with the widow and she said: 'I don't, I don't have enough here'. He said: 'Well, you go borrow some vessels 'cause I'm about to do a miracle. You, you go borrow'. If you have to move some funds around from one account to the next. It may be money you'd set aside for a different purpose, a rainy day, a new car, maybe an income tax return you just got. It may be money you got from a birthday gift or a bonus on your job, or it may be money you put down on your bank card. However, the Holy Spirit's made it possible, I'm going to pray a prayer right now that we're going to go to the phone and I wanna ask you as fast as you can. Don't negotiate this. If you sowed two days ago, it's a different day now. If you're feeling the Holy Spirit obey that, obey that, obey that, obey that. Don't let these moments close with your hands closed. There's 700 of us going to plant a seed of \$1,000. There's, there's five of us are going to sow a \$7,000 seed, and we're going to do it as under the Lord wrapping our faith around it, calling in. This is a moment of opportunity. If you let your budget decide your giving, Satan will always control your present seed and your future harvest. If you keep what's in your hand, that's the most it'll ever be. But if you release it to God, that's the least it'll ever be

'cause God's gonna get in covenant with it and send it back to you good measure, pressed down, shaken together and running over.

Father, in Jesus name, I joined my faith with these men of God standing next to me right now. With Pastor Chris watching right now, with Pastor Benny, with the entire Loveworld Team and we decree today's a bad day for the Devil. We lose today the harvest of God and Holy Spirit, you're giving us instructions right now. You're speaking to 700 of us. There may be a lot more than 700, but they'll be at least 700 that hear the voice of the Holy Spirit to plant a \$1,000 seed. And they're going to the phone to do it right now. They're sowing online, right now. They're scanning to sow, right now.

Father, there's five of us that are going to join me and sow a \$7,000 seed. Some of us are sowing it for every member on our church staff. Some are sowing it from every member of our inner circle on our business. We're decreeing today's a bad day for the devil. We've asked you for financial favour. We've asked you for financial miracles and every time you ask us for a miracle, you give us an instruction. The instruction we follow decides the future we inherit, we create. So today there's not a disobedient person listening to my voice right now. There's not a delaying part of us. We swiftly respond to the voice of the Holy Spirit because everything we have, came from you anyway Father. So, I come into a harvest agreement right now from the north or south and the east and the west, we call in your harvest. From your \$1,000 seed. Your \$7,000 seed. Your \$100,000 seed, your \$1,000,000 seed. We call it in right now according to your faith and obedience in Jesus' precious name. Amen and Amen. It is done.

Go to the phone right now, the number that's on the screen, don't delay it. Now is the time to go. Let's send a message to the enemy, to Pastor Chris and to the Lord Jesus Christ. We're standing with Loveworld for the gospel of the Lord Jesus Christ. Six billion souls, in Jesus's name".

Dr Payne: *"Praise God and Doctor Smalley they are calling, people are calling, they're answering the, the challenge, and in just a moment ah Doctor Roberts is going to come and pray a prayer of faith and, and I was just going through some of the testimonies 'cause some people may say, well, do miracles really happen?"*

Dr Payne: *[...] "Here, here is what Loveworld does. Here's what happens at Loveworld. Uh, here's Anthony, he said: 'Loveworld has changed my life'".*

Dr Smalley: *"Yes".*

Dr Payne: *“Spiritually, I’m a whole new man. I now know what it means to walk with Christ”.*

Dr Smalley: *“Wow!”*

Dr Payne: *“I have taken total dominion of my life”.*

Dr Smalley: *“Wow! Wow!”*

Dr Payne: *“That’s one. Here’s Sam: ‘I was diagnosed with breast cancer. I called for prayer during the Praise-A-Thon⁴, spoke with one of the pastors in the call centre, he prayed and spoke words into my life”.*

Dr Smalley: *“Wow!”*

Dr Payne: *“The last part, ‘I am cancer free –”.*

Dr Smalley: *“Look at that”.*

Dr Payne: *“– to the glory of God. Hallelujah, I’m cancer free’. That’s gonna happen today. I believe that with all my heart. Here’s Teresa: ‘I sowed a \$100 seed believing God for a dream home and now I have it”.*

Dr Smalley: *“Wow, wow, wow!”*

Dr Payne: *“The Lord answered our prayers”.*

Dr Smalley: *“Pastor James listen, I wanna just say if you’re calling right now for your \$1,000 seed, you don’t yet have a debt free home. I would make that absolutely one of the harvest that you’re wrapping your faith around. If you’re renting a house, but you’d like to own a home if you don’t have. If you’re in college and you’re about to get out, you wanna house. There’s an anointing on a debt-free home right now. Go to the phone right now. Dial the number that’s on the screen, plant this \$1,000 seed. It’s the Holy Spirit I’m making one of the harvest. I’m calling in a debt-free house. If God could do it for Cheryl in Pennsylvania, God can do it for you. Call right now. Don’t delay this”.*

Dr Payne: *“Cheryl said: ‘I gave a seed during the recent Praise-A-Thon and I received double back in the mail”.*

Dr Smalley: *“Wow, wow!”*

Dr Payne: *“I love this network so much and I’m grateful for what God –”.*

Dr Smalley: *“Beautiful”.*

Dr Payne: *“– has done in my life’. Here’s Sandra: ‘After I gave during the last Praise-A-Thon, the Lord surprised me with a large cheque. It came from an unexpected source, and it was the biggest one I had ever received”.*

⁴ An event on Loveworld in which sermons, prayer and gospel are broadcast live across multiple days.

Dr Smalley: *"Wow, wow! Praise God".*

Dr Payne: *"That's what is happening when we have Praise-A-Thon. There is an anointing here during Praise-A-Thon. God has accumulated believers together, different anointings. Different anointings you know, destinies are born where anointings intersect. Destinies are born where anointings intersect and God has intersected anointings here to birth destinies in people's life that have joined us. Your financial destiny is about to change. Your physical destiny is about to change. Your marriage destiny is about to change because God is about to get involved –".*

Dr Smalley: *"Yes, yes!"*

Dr Payne: *"– in what involves you –".*

Dr Smalley: *"Oh praise God!"*

Dr Payne: *"– because you with your seed have got involved with what concerns God".*

Dr Smalley: *"Absolutely".*

Dr Payne: *"Television concerns God. Reaching lives concerns God. Touching people around the world, reaching six billion people is a concern of God and when we get concerned about what concerns God, he gets concerned about what concerns us".*

Dr Smalley: *"Praise God".*

Dr Payne: *"Maybe you need a, a healing. Maybe you need a miracle. Maybe you need a financial breakthrough. Maybe you need a job. I, I mean, the first of this year, January, a lady sends me a message on Twitter. She says: 'I have two children and I'm homeless, living in a shelter'. I said, well, you need to start sowing to Loveworld. So a few weeks goes by she writes back, she says: 'I just sowed my first seed to Loveworld'. I followed her I, I sent her messages. She kept giving to Loveworld –".*

Dr Smalley: *"Wow!"*

Dr Payne: *"– and she just told me this, this last week right before I came to Praise-A-Thon she said: 'We now have our own apartment –".*

Dr Smalley: *"Wow!"*

Dr Payne: *"– I have a job –".*

Dr Smalley: *"Praise God".*

Dr Payne: *"– God is blessing our life'. I'm going to tell you I ran down the office when I got that, when I got that message, that can happen for you. It's not enough just to sit and listen and have your faith built by great*

messages from men of God, you have to move. You have to act on that faith”.

Dr Smalley: *“Follow the instructions”.*

Dr Payne: *“Follow that instruction. You said God gives us opportunity. The greatest revelation that ever came to my life was when God told me I, I am not obligated to you beyond the opportunity. If the widow don’t bake the cake, she and her son die. God didn’t send her a cake. God didn’t send her a meal barrel. God sent her a prophet –”.*

Dr Smalley: *“Yeah”.*

Dr Payne: *“– and when she ministered and did what God told her to do, God got in her oil. God got in her meal barrel”.*

Dr Smalley: *“Praise God”.*

Dr Payne: *“God’ll get in your car business. God’ll get in your real estate business”.*

Dr Smalley: *“Right”.*

Dr Payne: *“God, come on, I said God get in your car business”.*

Dr Smalley: *“Yeah, yeah!”*

Dr Payne: *“God’ll get in your real estate business. God’ll get in your fishing business. We heard Doctor Avanzini and also Doctor Roberts talk about how God got in Peter’s fishing business”.*

Dr Smalley: *“Yeah, yeah”.*

Dr Payne: *“God’ll get in business with you”.*

Dr Smalley: *“Yeah, yeah”.*

Dr Payne: *“God will get in business with you. I’ve read the story many times about Tom Monaghan, who started Domino’s Pizza. He was a Catholic. And his business was going under, his business was going under. He didn’t know what to do. His brother James, who started a business with him, left him”.*

Dr Smalley: *“Right”.*

Dr Payne: *“He went in the backroom. He, he prayed, he said: ‘God, I want to make you my partner’. A, a Catholic nun. He was raised in an orphanage. His dad died on Christmas Eve. He was left in an orphanage with his brother”.*

Dr Smalley: *“Wow!”*

Dr Payne: *"Had no hope but a nun by name of Sister Berarda, started encouraging him. She created a domino effect. She affected him and he affected the world".*

Dr Smalley: *"Yeah, yeah".*

Dr Payne: *"Are you hearing what I'm saying? She affected him, and he affected the world. We don't know on Loveworld when we sow, that message is going to get to some young man, some young woman that has a touch of God on their life. And they're going to start a domino effect around the world. People are going to be touched. Tom Monaghan made God his partner, God told him".*

Dr Smalley: *"Wow! Say that again".*

Dr Payne: *"Tom Monaghan made God his partner".*

Dr Smalley: *"God his partner, he made God his partner".*

Dr Payne: *"Because, because a Catholic nun gave him five instructions".*

Dr Smalley: *"Wow!"*

Dr Payne: *"Said: 'If you'll do these five things, God'll help you'. He did those five things. One of them was: 'Make God your partner'; another was: 'Be a big giver'".*

Dr Smalley: *"Yeah, there you go".*

Dr Payne: *"Be a big giver".*

Dr Smalley: *"All goes back to the instruction".*

Dr Payne: *"And so he, he followed that instruction. His brother left him. And God said: 'If the pizza, they won't come to you for pizza, take the pizza to them'".*

Dr Smalley: *"Wow, think of that".*

Dr Payne: *"So he decided: 'In 30 minutes or less I'll get the pizza to you'".*

Dr Smalley: *"Wow! Thank everything".*

Dr Payne: *"Then it wasn't staying hot. If you ever order a carryout pizza, and it's hot, thank Tom Monaghan. He invented that insulated thing that they cover 'em in".*

Dr Smalley: *"Wow, think about that".*

Dr Payne: *"Come on, think about that he started in. He started, he started with one pizza store. Ten years later he had 200".*

Dr Smalley: *"Wow!"*

Dr Payne: *"Then he ended up with 8,560 stores in 54 countries".*

Dr Smalley: *"Think about it, think about it. Say that".*

Dr Payne: *"He created a domino effect".*

Dr Smalley: *"Oh praise God!"*

Dr Payne: *"Around the world".*

Dr Smalley: *"Because he followed an instruction".*

Dr Payne: *"In making God his partner. You don't know what God will do in your life when you make God your partner. When you say God, I need you to get involved with my business. Tom Monaghan was the largest giver to fight abortion in this country".*

Dr Smalley: *"Wow!"*

Dr Payne: *"Are you hearing me? At one time he owed 1,000 people. He had 150 lawsuits against him at one time –".*

Dr Smalley: *"Wow!"*

Dr Payne: *"– but he came out of every one of them –".*

Dr Smalley: *"Think about that".*

Dr Payne: *"– because God was his partner".*

Dr Smalley: *"His seed talked on his behalf".*

Dr Payne: *"Oh Hallelujah!"*

Dr Smalley: *"The seed was talking".*

Dr Payne: *"His, his seed spoke later than his situation. His seed spoke louder than his circumstance. His seed spoke louder than his bank account".*

Dr Smalley: *"Yeah, say it".*

Dr Payne: *"He made God –".*

Dr Smalley: *"Yes, oh Hallelujah! Hallelujah!"*

Dr Payne: *"– I'm talking about a Catholic that loved God, he built. You know he, he retired several years back and he sold a billion dollars worth of stock, a billion dollars worth of stock".*

Dr Smalley: *"Think about that".*

Dr Payne: *"A few months later, he had given over 560 million of it away".*

Dr Smalley: *"Wow!"*

- Dr Payne: *“And the news asked him, why are you giving away so much money? And I never will forget, this is a direct quote. He said: ‘It’s not my money, it’s God’s money and I want to spend it on the highest thing I can spend it on and that is getting many people to heaven as I can”*”.
- Dr Smalley: *“Wow, come on somebody praise God, praise God!”*
- Dr Payne: *“I asked him what are those three dots on the pizza box for? Here’s what he said. God the Father, God the Son and God the Holy Ghost”*.
- Dr Smalley: *“Praise God!”*
- Dr Payne: *“I’m talking about a domino effect”*.
- Dr Smalley: *“Yeah!”*
- Dr Payne: *“I’m talking about somebody affecting you. And you affecting the world”*.
- Dr Smalley: *“Praise God!”*
- Dr Payne: *“Come on. Are you listening?”*
- Dr Smalley: *“I gotta go back to the phone room. I want to pray for some folks, there’s, there’s a divine moment here”*.
- Dr Payne: *“We gonna have Richard pray just a moment for miracles, Amen. We’re gonna have, we’re gonna have uh, uh Richard just speak the word and miracles going happen. We’re gonna have testimony just like these”*.
- Dr Smalley: *“Yeah, absolutely. No respect your persons”*.
- Dr Payne: *“Choir, take the [inaudible] set the atmosphere. God is about the move around the world”*.
- Dr Smalley: *“I’m going to go to phone right now”*.
- Dr Payne: *“God is about to create a domino effect around the world”*.

We considered that the content from both programmes detailed above raised potential issues under the following Code rules:

- Rule 2.1: *“Generally accepted standards must be applied to the content of television and radio services...so as to provide adequate protection for members of the public from the inclusion in such services of harmful material”*.
- Rule 4.6: *“Religious programmes must not improperly exploit any susceptibilities of the audience”*.

Ofcom requested comments from the Licensee about how the programmes complied with these rules.

Response

LL said that *Your Loveworld* is a “Christian programme” that was not harmful or offensive “in any way”. It said, “sowing seeds and believing for a harvest” and “giving is part and parcel of our Christian faith”. It said the programme was “encouraging Christians to believe the Bible and act accordingly”, adding that it considered this “in no way exploits the public”. The Licensee also said it did “not believe that any members of the public were improperly exploited” during the broadcast of the programme.

LL said that it is a business organisation and that it “does not solicit funds for itself on TV”, adding that this programme “was not used to solicit funds for Loveworld Limited”. The Licensee said that the programme was transmitted on behalf of Christ Embassy⁵, which it said is a registered charity. It added that its relationship with Christ Embassy “is and remains a business relationship”.

LL said that it was “happy to bring to the attention of Christ Embassy these concerns raised”, so that it could, “educate their speakers in future as to the use of language on air relating to soliciting of funds for the protection of the general public”.

Having considered the Licensee’s initial comments, Ofcom provided LL with its Preliminary View that the programme was in breach of Rule 2.1 and 4.6 and requested its further comments.

In response, the Licensee said that the broadcast did not include harmful material or improperly exploit susceptibilities of the audience. LL argued Ofcom had reached a Preliminary View that the programme was in breach because Ofcom had not looked at the content from a Christian perspective, suggesting “it may be that Rule 4.6 in some way is not considerate of the Christian belief that the [B]ible is the authentic word of God” adding “it almost seems like you are deciding what part of our Christianity you agree we are allowed to air and which part we are not”.

The Licensee noted that Loveworld is a Christian channel and that, “a Christian Minister of the gospel does not think like a non Christian would think, he thinks as a Christian based on the teachings in the bible”. It then gave some examples of how it considered statements in the programme to be consistent with scripture, providing specific biblical quotes. In particular LL argued that:

- (i) The statement by Dr Smalley that, “*I want to look into the camera and say this is an opportunity for you to use your faith*”, would be understood by a Christian in the context of the words, “for we walk by faith, not by sight [living our lives in a manner consistent with our confident belief in God’s promises]” (2 Corinthians 5:7).
- (ii) The statement by Dr Smalley, in response to a notional viewer who may be reluctant to donate, “*Don’t negotiate this. If you sowed two days ago, it’s a different day now. If you’re feeling the Holy Spirit, obey that, obey that, obey that, obey that*”, should be seen in the context of the words, “While they were worshipping the Lord and fasting, the Holy Spirit said, “Set apart for me Barnabas and Saul for the work to which I have called them”. (Acts 13:2). The Licensee said that, “this is in no way improperly exploiting any susceptibilities of the

⁵ Christ Embassy (also known as Loveworld Inc or Believers’ Loveworld) is a Christian denomination church founded by Pastor Chris Oyakhilome in 1987. Loveworld is one of seven TV channels that Christ Embassy runs.

Christian, It is encouraging them to go ahead and do what the Holy Spirit said to do because we know from the scriptures that it is safe to do so and not harmful”.

LL disagreed that those most likely to make donations were potentially vulnerable, and specifically those facing financial or health difficulties. Firstly, it said that “they are not donations they are seeds and there is a difference”. Second, it said the messages were aimed at Christians generally rather than those facing financial and health difficulties, referring to Romans 10:9⁶ and noting that, “Our audience are Christians who understand about sowing seeds and reaping a harvest, who understand what it means to have eternal life and live in divine health”. The Licensee queried whether anyone had complained to Ofcom about the programme and submitted there was no evidential basis for Ofcom to conclude that the messages were most likely to appeal to those facing serious financial and health difficulties.

LL referred to Ofcom’s Preliminary View that: the programme clearly linked requests for donations and testimonies of positive outcomes and rewards to the idea that devoted, or obedient, Christians would donate; whereas those that had not donated, were “*disobedient*” and allowed Satan control over their lives. The Licensee said that it did not agree this is what was inferred in the programme. It said that Ofcom “may call it exploitation but from our perspective it is not at all because it is there in the scriptures which we as Christians believe in”⁷.

LL also referred to the contribution its service made to the economy and community in terms of providing employment and other opportunities, and to its financial capacity to pay any financial penalty.

Decision

Reflecting our duties under the Communications Act 2003, Section Two of the Code provides protection for members of the public from the inclusion of harmful material. Section Four requires broadcasters to exercise a proper degree of responsibility when making and broadcasting religious programmes.

Ofcom takes into account a broadcaster’s right to freedom of expression and the audience’s right to receive information and ideas as set out in Article 10 of the European Convention on Human Rights (“ECHR”). Where applicable, we also have regard to Article 9 of the ECHR which states that everyone “has the right to freedom of thought, conscience and religion”.

Rule 2.1

Rule 2.1 requires broadcasters to apply generally accepted standards so as to provide adequate protection for the audience from the inclusion of harmful material in programmes.

⁶ “If you declare with your mouth, “Jesus is Lord,” and believe in your heart that God raised him from the dead, you will be saved”.

⁷ LL specifically referenced Luke 6:38 (“give, and it will be given to you. Good measure, pressed down, shaken together, running over, will be put into your lap. For with the measure you use it will be measured back to you”) and Corinthians 9:6 (“Remember this: Whoever sows sparingly will also reap sparingly, and whoever sows generously will also reap generously”).

When considering a programme's compliance with Rule 2.1, Ofcom must assess the nature of the content and whether there is a reasonable likelihood of it causing members of the public actual or potential harm. Context is important and the extent of any protection required will depend on all the circumstances, including the service on which the material is broadcast, the degree of harm likely to be caused, and the likely expectation of the audience.

First, Ofcom assessed whether the statements made in *Your Loveworld* were potentially harmful to viewers.

We took into account that the programme included a number of statements that encouraged viewers to make donations beyond their financial means, and suggested amounts ranging from \$1,000 to \$1 million. This included the following:

Dr Smalley: *"Some of you may say Mike, it's a bad time to sow a \$1,000 seed. I'm gonna have to just wait a few more weeks, few more months. But you know you feel the Holy Spirit saying it to you today. Doctor Avanzini talked about how, when Elijah was dealing with the widow and she said: 'I don't, I don't have enough here'. He said: 'Well, you go borrow some vessels 'cause I'm about to do a miracle. You, you go borrow'. If you have to move some funds around from one account to the next. It may be money you'd set aside for a different purpose, a rainy day, a new car, maybe an income tax return you just got. It may be money you got from a birthday gift or a bonus on your job, or it may be money you put down on your bank card. However, the Holy Spirit's made it possible. I'm going to pray a prayer right now that we're going to go to the phone and I wanna ask you as fast as you can. Don't negotiate this. If you sowed two days ago, it's a different day now. If you're feeling the Holy Spirit obey that, obey that, obey that, obey that. Don't let these moments close with your hands closed. There's 700 of us going to plant a seed of \$1,000".*

Dr Smalley: *"[...]we call in your harvest. From your \$1,000 seed. Your \$7,000 seed. Your \$100,000 seed, your \$1,000,000 seed. We call it in right now according to your faith and obedience in Jesus precious name. Amen and Amen. It is done".*

Dr Smalley: *"I wanna just say if you're calling right now for your \$1,000 seed, you don't yet have a debt free home. I would make that absolutely one of the harvests that you're wrapping your faith around. If you're renting a house, but you'd like to own a home you don't have. If you're in college and you're about to get out, you want a house. There's an anointing on a debt free home right now. Go to the phone right now. Dial the number that's on the screen, plant this \$1,000 seed. It's the Holy Spirit, I'm*

making one of the harvests. I'm calling in a debt free house. If God could do it for Cheryl in Pennsylvania, God can do it for you. Call right now. Don't delay this".

In Ofcom's view the statements above encouraged viewers to donate from money they had "set aside for a different purpose" including "an income tax return you just got" and "a rainy day", and to "borrow" money or "put money down on your bank card" in order to make a donation. Ofcom considered some of this content actively encouraged viewers to spend beyond their means and leave themselves financially exposed or even in debt to make a donation. We also took into account that the presenters referred to substantial amounts of money, calling for viewers to donate "your \$1,000 seed, your \$7,000 seed, your \$100,000 seed, your \$1 million seed". We considered this compounded the potential for harm by increasing the pressure on viewers to make a donation that, even at the lowest of those levels, was likely to have had a material impact on the finances of a typical person.

Ofcom also considered that the presenters linked the giving of donations to material rewards from God. This included statements from the presenters such as:

- *"That's the Jesus we love, that's the, that's the instruction that God gives us as we can keep what's in our hand or we can sow it. Let God get in covenant with it and let him send it back to us".*
- *"We're going to stand up and believe God to give us good measure".*
- *"plant this \$1,000 seed[...]I'm calling in a debt free house[...]God can do it for you".*
- *"Your financial destiny is about to change. Your physical destiny is about to change. Your marriage destiny is about to change because God is about to get involved [...] in what involves you [...] because you with your seed have got involved with what concerns God".*

In addition to the references above, the programme included a number of testimonies attributed to viewers who had claimed that they had received financial or health improvements as a result of making a donation or calling the number displayed on-screen. This included the following:

- A viewer with breast cancer, who called for a prayer, "spoke with one of the pastors in the call centre" who prayed and "spoke words into my life". The caller had said that she was "cancer free" and Dr Payne said that "that's gonna happen today, I believe that with all my heart".
- A person who "sowed a \$100 seed believing for a dream home and now I have it".
- A person who made a donation during a Praise-A-Thon and "received double back in the mail".
- A caller who made a donation and "the Lord surprised me with a large cheque. It came from an unexpected source and it was the biggest one I had received".
- A viewer with two children who was homeless and living in a shelter, donated and who Dr Payne said "kept giving to Loveworld". Dr Payne then said following these donations, the viewer told Dr Payne they "now have our own apartment [...] I have a job [...] God is blessing our life".

Dr Payne gave a further example of Tom Monaghan, the founder of Domino's Pizza. He said that Mr Monaghan's "business was going under" and to rectify this, he followed instruction given to him by a nun to make "God his partner" and "be a big giver". Dr Payne said that after doing so, Mr Monaghan's business grew. Dr Payne also referred to financial and legal issues facing Mr Monaghan and said that

“at one time he owed 1,000 people. He had 150 lawsuits against him”, but that Mr Monaghan *“came out of every one of them, because God was his partner”*. In concluding this testimony, Dr Smalley said that Mr Monaghan’s *“seed spoke louder than his circumstance. His seed spoke louder than his bank account”*. Dr Payne followed this by saying: *“miracles going to happen. We’re gonna have testimonies just like these”*. Ofcom considered these statements emphasised the encouragement for viewers to donate beyond their financial means for the promise of future rewards.

Ofcom took into account that the testimonies given included people that had been experiencing serious health or financial challenges at the time of their donation and had attributed the resolution of these challenges to Loveworld and their donation. Ofcom considered that this gave the impression that the act of donating offered a solution to very challenging situations that people might be facing in their everyday lives. We considered that this was a potentially harmful message that may have resulted in viewers donating more than they could reasonably afford in the hopes of being rewarded as those in the testimonies had been. The statements in this programme offered what was presented as a solution to serious financial or health difficulties and gave the impression that the only barrier to overcoming issues facing viewers may be facing was making a donation as an act of devout faith, regardless of whether the viewers could afford it. Additionally, we considered the references to material rewards from God exacerbated the issue identified above related to encouraging people to go into debt or leave themselves financially exposed in order to donate. This was because it strongly implied that those liabilities could be met by such rewards in future.

Ofcom’s research into [Health and wealth claims in programming: Audience attitudes to potential harm](#), indicates that there is a hierarchy of factors that affect the level of harm arising from health and wealth claims. [Ofcom’s Guidance to Section Two of the Code](#) (“the Guidance”) drew on the findings of the health and wealth claims research. The Guidance highlights primary factors that would influence the level of harm that could arise from health or wealth claims, including the severity of the situation (e.g., most serious medical conditions or situations of extreme financial hardship), the level of targeted exploitation (i.e., the vulnerability of the audience) and the authority of the speaker. In considering whether the statements made in the programme were potentially harmful to the audience, Ofcom took these contextual factors into account.

Ofcom took into account that viewer expectations and understanding of content on a particular service can, in some cases, offer some protection from potentially harmful messages in programming. We took into account that viewers in this case were likely to be practising Christians who supported Loveworld and Christ Embassy. We considered viewers were likely to place a great deal of trust in the presenters and pastors responsible for delivering sermons, prayers, and other religious programming such as *Your Loveworld*, and were likely to regard them as authoritative religious figures, closely associated with the church and Pastor Chris, the founder of Christ Embassy. Ofcom considered the status of religious authority held by the presenters was likely to be a significant factor in how viewers of the programme might interpret repeated encouragement to donate funds for the promise of rewards and this would make them more vulnerable to potentially harmful messages that encouraged donations.

We considered the Licensee’s argument that, in the absence of complaints about the programme, there was no evidential basis for Ofcom to conclude that the messages were most likely to appeal to those facing serious financial or health difficulties, as set out in our Preliminary View. In considering

compliance with Rule 2.1, Ofcom assesses the material broadcast against the potential for it to cause harm to viewers. In doing so, Ofcom is not required to identify any causal link between the content broadcast and any specific instances of actual harm to viewers. Ofcom acknowledged that it did not receive complaints about the programme and that it was identified through monitoring following previous serious breaches of the Code, and that we do not directly know who made donations and their health or financial position. However, we considered the absence of complaints about this programme did not indicate there was an absence of a potential risk of harm to viewers. We considered it remained reasonable to conclude that the messages contained in this programme were particularly likely to appeal to those who were potentially vulnerable, specifically those that might be facing serious financial or health difficulties. In particular, some of the content indicated that donation would bring financial and health benefits to the donor, including examples being given of individuals said to have been in a particularly vulnerable position (e.g. a person suffering from breast cancer, and a homeless person) whose health and financial position were said to have improved as a direct result of donating. The content also specifically addressed those who lacked readily available funds to make a donation, calling on them to *“borrow”* money or *“put money down on your bank card”*.

Ofcom considered LL’s argument that this programme did not constitute any form of harm or improperly exploit susceptibilities of the audience. We considered their view that statements made in the programme were not harmful as they would have been understood as reminding viewers to live lives consistent with the Bible. We also considered the Licensee’s representations that it did not consider those likely to donate funds were potentially vulnerable and that their *“audience are Christians who understand about sowing seeds and reaping a harvest”* and that, in LL’s view, the programme did not seek donations but that *“they are seeds and there is a difference”*.

We acknowledged that the concept of sowing and reaping is a common teaching of the Christian faith, and LL provided examples from the Bible to that effect. The Code does not prevent broadcasters from promoting the validity of particular religious beliefs or practices, nor from encouraging people with religious faith to behave in a manner that is consistent with those practices, including by choosing to make donations to religious institutions. However, broadcasters are required to do so in a manner which complies with the Code, including by applying generally accepted standards so as to provide adequate protection from harm.

We considered the statements made in this programme went beyond promoting the validity of religious beliefs and practices into the explicit, lengthy and detailed instruction to viewers that they should donate even if this involved donating beyond their financial means and taking financial risks. In addition the programme claimed that donations would result not merely in spiritual rewards but in immediate financial, material or health rewards.

Taking all of the above factors into account, we considered the calls from figures of authority on a religious channel for viewers to make sizeable donations, regardless of whether they could afford it, and to make donations with the hopes of receiving financial reward or health improvements, had the potential to be harmful to viewers.

Ofcom went on to consider whether the Licensee provided adequate protection to viewers from this potentially harmful material. It is an editorial decision for the broadcaster as to how adequate protection might be achieved and our Guidance states that there are various methods broadcasters

can consider. Whether any such protection is adequate will depend on all the relevant circumstances, including: the health, financial or lifestyle problems being discussed; the extent to which a cure or answer is offered; and any warnings or caveats given to viewers. Warnings or caveats in this context might include disclaimers or medical warnings which our Guidance highlights as potential methods broadcasters might use to protect viewers from potential harm.

Given the context of the programme, Ofcom examined whether the Licensee had taken any steps to provide adequate protection for viewers during this broadcast. Ofcom took into account that the programme did not include any disclaimers or warnings alongside the recommendations that viewers should make substantial donations even if this was beyond their means and involved leaving them financially exposed or in debt. Ofcom considered that this programme did not offer any protection from the potential harm to viewers from the lengthy and detailed calls from figures of authority to donate money for the promise of financial or health rewards.

We took into account that, in its representations, the Licensee said that this programme was broadcast on behalf of Christ Embassy. Ofcom also acknowledged that LL said it was “happy to bring to the attention of Christ Embassy these concerns raised”, so that it could “educate their speakers in future as to the use of language on air relating to soliciting of funds for the protection of the general public”. Broadcast licensees, including LL, are responsible for all content broadcast on their channels, and may, of course, obtain content from others for the purposes of broadcast. But, in this case it was the Licensee, LL, and not Christ Embassy, that was: subject to the provisions in the Code; and responsible for ensuring that the content as broadcast was compliant, including that viewers were adequately protected from potentially harmful content. While providing guidance to programme producers and contributors is one aspect of securing compliance, ultimate editorial responsibility for the contents of a licensed Ofcom service cannot be delegated. Ofcom also took into account that the programme was pre-recorded and that the Licensee would have had the opportunity to ensure the content was compliant ahead of broadcast, which it failed to do. We were concerned that the broadcast of this content suggests that LL may not have had a full understanding of the Code and its compliance responsibilities. As a result, potentially harmful content was broadcast in this programme, and there was no information included that might have protected viewers in this case.

For all the reasons outlined above, our Decision was therefore that the Licensee did not provide adequate protection to the audience from the inclusion of the potentially harmful material in this programme, and therefore in breach of Rule 2.1.

Rule 4.6

Rule 4.6 of the Code states that religious programmes must not improperly exploit any susceptibilities of the audience.

In assessing the programme’s compliance with Rule 4.6, we took into account the Licensee’s representations that the programme was a “Christian programme” and as detailed in the introduction, the programme focused on Christian teachings and prayers from the Bible. Ofcom was therefore satisfied that the programme was a “religious programme” as defined in Section Four of the Code.

Ofcom's [Guidance on Section Four](#) (“Guidance on Section Four”) of the Code on Rule 4.6 states: “there are times when it will be clear to the broadcaster that they are soliciting an actual response from their

audience. At these times broadcasters need to take care and recognise the possible risk to audience members particularly the vulnerable". In relation to "improper exploitation" the guidance notes this includes seeking to convince a person to subscribe to a particular set of beliefs "on the grounds that if they don't, some negative outcome might result".

Ofcom considered that in the case of this programme, donations were explicitly solicited by presenters that held considerable authority for LL's viewers, who were also likely to be Christians following religious teachings from Christ Embassy. Therefore, in our view, there was the potential for the audience's susceptibilities to be improperly exploited.

Ofcom took into account that in the programme there were several instances in which requests for donations were linked to God, Christian faith and obeying religious calls to action. Ofcom considered the following statements that appealed to the religious faith of the audience:

- *"stand with the Loveworld team and say we're not going with the Devil run riot, shot over our families anymore, over our nations anymore. We're going to stand up and believe God to give us good measure".*
- *"I want to look into the camera and say this is an opportunity for you to use your faith".*
- *"Some of you may say, 'Mike it's a bad time to sow a \$1,000 seed. I'm gonna have to just wait a few more weeks, few more months', but you know you feel the Holy Spirit saying it to you today. Today's the day".*
- *"Don't negotiate this. If you sowed two days ago, it's a different day now. If you're feeling the Holy Spirit, obey that, obey that, obey that, obey that".*
- *"If you let your budget decide your giving, Satan will always control your present seed and your future harvest. If you keep what's in your hand, that's the most it'll ever be. But if you release it to God, that's the least it'll ever be".*
- *"We're decreeing today's a bad day for the devil. We've asked you for financial favour. We've asked you for financial miracles and every time you ask us for a miracle, you give us an instruction. The instruction we follow decides the future we inherit, we create. So today there's not a disobedient person listening to my voice right now. There's not a delaying part of us. We swiftly respond to the voice of the Holy Spirit because everything we have came from you anyway Father".*
- *"It's not enough just to sit and listen and have your faith built by great messages from men of God, you have to move. You have to act on that faith [...] follow that instruction".*

We took into account the Licensee's argument that requests for donations were linked to the Christian belief in reaping and sowing. In line with its Article 9 Rights, LL has the right to inform viewers about, and promote, this practice as part of its religious programming. We also took into account the Licensee's representations that the content of this programme was "encouraging Christians to believe the Bible and act accordingly" and did not exploit its audience because the teachings in the content were "in the scriptures which we as Christians believe".

Ofcom has had regard to the Licensee's and audience's right to freedom of religion and expression. It does not raise a Code issue in itself for a religious channel to offer prayer, encourage religious practices, solicit for donations and broadcast the belief that God can perform miracles. However, in doing so, broadcasters must comply with the Code and therefore, in a religious programme, must not improperly exploit any susceptibilities of the audience.

In its consideration of whether these statements constituted improper exploitation of the audience's susceptibilities, Ofcom took into account that the presenters repeatedly instructed viewers to "obey" the call for donations, which they said came from God. Ofcom also took into account the statements in the programme that told viewers if they only gave what they could afford, Satan would be in control of their "present seed", which, we considered, could be reasonably interpreted by viewers as their current financial, health and life situation. We considered that these messages were likely to hold particular weight with Christians and vulnerable people experiencing financial or health difficulties who might be seeking a solution or assistance in overcoming their challenges. Ofcom considered that the statements aligned making a donation with an expression of devotion to God and not making a donation, even if this was a judgment made on affordability grounds, as "going with the Devil run riot", being "disobedient" and giving Satan control (a clear "negative outcome" for a Christian viewer within the meaning of "improper exploitation" as set out in our Guidance on Rule 4.6). By aligning viewers' decisions on whether they make a donation to their obedience as a Christian and resistance of Satan, Ofcom considered that the susceptibilities of the audience were improperly exploited.

Ofcom took into account the Licensee's representations that we had not considered the programme from a Christian perspective, and its view that Rule 4.6 might not be "considerate of the Christian belief that the [B]ible is the authentic word of God". Ofcom recognises that a religious channel serving a Christian audience will wish to broadcast programming which shares and explores biblical teachings and Christian beliefs in line with its Article 9 rights, and it is legitimate for it do so. However LL must also ensure its programming complies with the Code. In our application of Rule 4.6, Ofcom makes no judgement on the veracity of any belief or faith. Its purpose is to protect viewers of religious programming from improper exploitation of their susceptibilities. In relation to "improper exploitation" our guidance notes makes clear this includes seeking to convince a person to subscribe to a particular set of beliefs "on the grounds that if they don't, some negative outcome might result". The Licensee in this case argued this programme did not exploit susceptibilities of viewers because the statements made were based in Christian scripture. Ofcom disagreed. This programme, as set out in our reasoning under Rule 2.1, clearly linked requests for donations and testimonies of positive outcomes and rewards to the idea that devoted, or obedient, Christians would donate whereas those that had not donated, were "disobedient" and allowed Satan control over their lives.

Taking into account the above factors, Ofcom considered that through the broadcast of this programme and the way in which it sought donations, LL had improperly exploited the susceptibilities of its audience, in breach of Rule 4.6 of the Code.

Decision: Breaches of Rules 2.1 and 4.6

Our Decision is that these breaches are serious and, in the case of Rule 2.1, repeated, and we are minded to consider them for the imposition of a statutory sanction. This is the fourth case in two years involving the broadcast by the Licensee of potentially harmful content, and it follows assurances of compliance improvements given by the Licensee after Ofcom imposed statutory sanctions for previous breaches of Rule 2.1⁸.

⁸ See Ofcom's previous Loveworld Limited sanction Decisions, published on [6 October 2021](#), [31 March 2021](#) and [22 June 2020](#).

Ofcom notes that the Licensee made representations in response to Ofcom's Preliminary View regarding its ability to pay any financial penalty, and on its contributions to the economy and community. These are not matters relevant to Ofcom's decision on breach of the Code but would potentially be relevant in due course in considering whether to impose a statutory sanction.